

8-ES-FO-803-003

FILED 054234
F. IND. 01-3

ENVIRONMENTAL PROTECTION AGENCY
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
OFFICE OF CRIMINAL INVESTIGATIONS
NEIC INVESTIGATIVE UNIT

Building 53, Box 25227, Denver Federal Center
Denver, Colorado 80225

2162237 - R8 SDMS

TO: All personnel involved in execution of the
Frankel Manufacturing Co. Search Warrant

DATE: April 18, 1985

FROM: William F. Smith, Special Agent

SUBJECT: Execution plan for Search Warrant

PURPOSE

A search warrant, based on written affidavit, is being obtained for the premises known as Frankel MANufacturing Co, 5125 Race Court, Denver, CO. Visual observation disclosed approximately 400 to 500 55 gallon drums of the type used to contain hazardous waste. The drums had labels listing the contents as being ignitable, and corrosive. One drum bore a label stating the contents are methyl ethyl ketone. The warrant will be used to document violations of the Resource Conservation and Recovery Act, and CERCLA.

The warrant team will consist of four Special Agents of the Office of Criminal Investigation of the Environmental Protection Agency, three Agents of the Federal Bureau of Investigation, four members of the Region VIII Environmental Services Division, and two people from the Region VIII, RCRA Compliance Section. Other personnel may be added as deemed necessary. Analysis of the samples will initially be performed by the N.E.I.C. lab in Lakewood, CO.

SAMPLING

Samples will be taken of any drums clearly labeled as having contained a hazardous waste. Samples will be taken as deemed appropriate of any drums that contain compounds which may be hazardous waste, or byproducts of the ink making process. Soil samples will be taken where there is evidence of spills or leaks of what may be hazardous materials. An estimate of the amount of spilled or leaking materials will be made to determine any violations of CERCLA reporting requirements. Any further samples will be taken as deemed appropriate by the sampling team leader, or the Agent in charge. Unless deemed appropriate by the sampling team leader only one sample will be taken for analysis. All drums from which samples are taken will be marked. As well as taking samples from the outside drum storage area it may become necessary to sample from locations inside the facility.

ANALYSIS

Because of the nature of some of the chemicals used in the processes at Frankel it is necessary to test for the ignition points of samples where deemed appropriate. Analysis will also be conducted to determine the presence of lead or chromium, or any other compounds which are hazardous wastes and are suspected of being present.